

John P. Sheridan
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Pro hac vice application filed for:
Nicholas M. Graziano
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*Attorneys for Defendants International
Longshoremen's Association,
ILA Local 1804-1, ILA Local 1233, and ILA Local 1235*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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| -----X | |
| INTERNATIONAL UNION OF OPERATING | : |
| ENGINEERS, LOCAL 825, | : |
| | : |
| Plaintiff, | : |
| | : |
| v. | : |
| | : |
| INTERNATIONAL LONGSHOREMEN'S | : |
| ASSOCIATION, INTERNATIONAL | : |
| LONGSHOREMEN'S ASSOCIATION LOCAL 1233, | : |
| INTERNATIONAL LONGSHOREMEN'S | : |
| ASSOCIATION 1235, and INTERNATIONAL | : |
| LONGSHOREMEN'S ASSOCIATION LOCAL 1804-1, | : |
| | : |
| Defendants. | : |
| | : |
| | : |
| -----X | |

Civil Action No.
2:23-cv-03689

**CERTIFICATION OF NICHOLAS M. GRAZIANO IN SUPPORT
OF AN APPLICATION FOR ADMISSION PRO HAC VICE
PURSUANT TO LOC. CIV. R. 101(c)**

NICHOLAS M. GRAZIANO, being of full age, hereby certifies as follows:

1. I am an attorney practicing in the State of New York and an associate of the firm of Mazzola Mardon, P.C., with offices located at 26 Broadway, 17th Floor, New York, New York 10004.

2. I am a member in good standing of the Bars of New York (admitted in 2018), the United States District Court for the Southern District of New York (admitted in 2019), the United States Circuit Court for the District of Columbia Circuit (admitted in 2022) and the United States Circuit Court for the Fourth Circuit (admitted in 2023).

3. The name and address of the official or office maintaining the roll of its members are as follows:

- i. New York: Attorney Records Clerk, Appellate Division, First Judicial Department, 41 Madison Avenue (at 26th Street) – 26th Floor, New York, New York 10010;
- ii. Southern District of New York: Clerk of Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007;
- iii. D.C. Circuit Court of Appeals: Clerk of Court for the U.S. Court of Appeals for the D.C. Circuit, 333 Constitution Ave., NW, Room 5205, Washington, DC 20001; and
- iv. Fourth Circuit Court of Appeals: Clerk of Court for the U.S. Court of Appeals for the Fourth Circuit, 1100 East Main Street, Suite 501, Richmond, Virginia 23219.

4. I submit this Certification in support of John P. Sheridan's application for my admission *pro hac vice* to appear and participate in this matter on behalf of the defendants.

5. No disciplinary proceedings are pending against me and no discipline has previously been imposed on me in any jurisdiction.

6. I shall notify the Court immediately of any matter affecting my standing at the bar of any other court.

7. If admitted to appear *pro hac vice*, I agree to abide by this Court's local rules, to submit myself to the disciplinary jurisdiction of this Court, and to make payment to the New Jersey Lawyer's Fund for Client Protection as provided in L. Civ. R. 101(c).

8. I have acquired a copy of the Local Rules of this Court and am generally familiar with such Rules.

9. I shall abide by all applicable rules of this Court including all disciplinary rules, as a continuing condition of admission.

10. All pleadings, briefs, and other papers filed with the Court shall be signed by an attorney of record authorized to practice before the United States District Court for the District of New Jersey, who shall be responsible for the conduct of the case and of the undersigned.

11. I am fully familiar with the facts of the case, the pertinent legal doctrines and case law, and Defendants wish for me to represent them.

12. Accordingly, I respectfully request that this Court grant my application for admission *pro hac vice*.

13. I have contacted counsel for Plaintiff International Union of Operating Engineers who have indicated their consent to my admission.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: September 8, 2023

Respectfully submitted,

MAZZOLA MARDON, P.C.



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